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April 10, 2020

VIA ECF

Honorable Steven M. Gold
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Sampson v. International Union of Operating Engineers**
Case No.: 1:19-cv-04946

Dear Magistrate Judge Gold:

We are counsel to defendant in this action. We write to request a one-week adjournment of the follow up conference currently scheduled for April 13, 2020 on plaintiff's motion to compel. As you may recall, during the telephonic conference on April 3, 2020, Your Honor asked the parties to meet and confer regarding running tailored reports of defendant's database. Given current events, there has been some natural delay in getting in touch with individuals to discuss the database, including defendant's outside IT vendor, who we just got in touch with and whose family member has COVID-19.

Accordingly, we request a one-week adjournment of the conference to April 20, 2020 to allow us to confirm the database capabilities and confer with plaintiff's counsel. Plaintiff's counsel consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Bran C. Noonan

Bran C. Noonan

CC: all counsel of record (by ECF)

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